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8 *Attorney for Defendants*  
 9 *Travel & Leisure Co.*  
 10 *Wyndham Worldwide Operations Inc. and*  
 11 *Wyndham Vacation Ownership*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 KLALEH J. PARKER, an individual,

15 Plaintiff,

16 vs.

17 TRAVEL & LEISURE CO.; WYNDHAM  
 18 WORLDWIDE OPERATIONS INC.;  
 19 WYNDHAM VACATION OWNERSHIP;  
 20 AND DOES 1-10 and ROE ENTITIES 1-10,  
 21 inclusive,

22 Defendants.

23 Case No. 2:25-cv-00354-MDC

24 **STIPULATION AND ORDER TO  
 25 EXTEND DEADLINE FOR  
 26 DEFENDANTS TO RESPOND TO  
 27 PLAINTIFF'S COMPLAINT  
 28 (FIRST REQUEST)**

29 IT IS HEREBY STIPULATED by and between Plaintiff Klaleh J. Parker ("Plaintiff"), by  
 30 and through her counsel, F. Travis Buchanan, Esq., & Assoc., PLLC, and Defendants, Travel &  
 31 Leisure Co., Wyndham Worldwide Operations Inc. and Wyndham Vacation Ownership  
 32 ("Defendants"), by and through their counsel, the law firm of Jackson Lewis P.C., that  
 33 Defendants shall have a 30-day extension up to and including **July 3, 2025**, in which to file their  
 34 response to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

35 1. Defendants were served with the Summons and Complaint on May 13, 2025, (ECF  
 36 No. 1) making Defendants' response to Plaintiff's Complaint currently due on June 3, 2025.

37 2. Defendants were recently retained and are still in the process of investigating  
 38 Plaintiff's allegations which include significant monetary damages, including, punitive damages.

39 3. The Parties have agreed to extend the deadline for Defendants to file their response

to Plaintiff's Complaint to July 3, 2025, to allow Defendants sufficient time to address the allegations within the Complaint.

4. This is the first stipulation to extend the time for Defendants to respond to Plaintiff's Complaint.

5. The Parties believe these circumstances constitute good cause for granting an extension. *See Fed. R. Civ. P. 6(b)(1).*

6. This Stipulation is made in good faith and not for the purpose of delay.

7. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation and Order shall be construed as an admission of or consent to the merit or validity of any claim, defense, objection, or right by any party in this case.

Dated this 3rd day of June, 2025.

F. TRAVIS BUCHANAN, ESQ., &  
ASSOC., PLLC

JACKSON LEWIS P.C.

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Wyndham Worldwide Operations Inc. and  
Wyndham Vacation Ownership*

*Attorneys for Plaintiff  
Klaleh J. Parker*

## ORDER

## IT IS SO ORDERED

United States District/Magistrate Judge

Date: 0-20-25